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**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: CARMEN BETTY JUSTINIANO : CHAPTER 13
 : Case No: 16-13880-ref
 :
 Debtor, : ORIGINAL PLAN XXX
 : AMENDED PLAN ☐

CHAPTER 13 PLAN PRE-CONFIRMATION

YOUR RIGHTS WILL BE AFFECTED

READ THIS PLAN CAREFULLY. If you oppose any provision of this Plan you must file a timely written objection. This Plan may be confirmed and become binding on you without further notice of hearing unless a written objection is filed before the deadline stated on the Notice issued in connection with the filing of the Plan.

1. DISCHARGE:

XXX The Debtor will seek a discharge of debts pursuant to Section 1328(a) .

☐ **The Debtor is not eligible for a discharge of debts because the Debtor has previously received a discharge described in Section 1328(f) .**

2. PLAN FUNDING AND LENGTH OF PLAN:

A. The future earnings of the debtor are submitted to the supervision and control of the Trustee and the Debtor, **CARMEN BETTY JUSTINIANO**, shall pay to the Trustee the total sum of **\$55,600.00** as follows:

Start/End Date	Plan Payment	Total Payment
6/31/16 through 11/30/2021	\$50.00	\$ 300.00
12/31/16 through 5/31/2021	\$1,024.07	\$55,300.00

B. The Plan's applicable commitment period is sixty (60) months.

C. The Debtor is responsible for funding the Plan.

3. PRIORITY CLAIMS

A. Allowed unsecured claims entitled to priority under Section 507 will be paid in full with the exception of certain assigned Domestic Support Obligations that may be paid less than 100% pursuant to Section 1322(a)(4):

Name of Creditor	Total Payment	Claim No.
None.		

B. Administrative Claims:

- (1) Trustee fees. Percentage fees payable to Frederick L. Reigle, Standing Chapter 13 Trustee, will be paid at the rate fixed by the Unites States Trustee, not to exceed 10%.
- (2) Attorney Fees. In addition to the retainer of \$1,890.00 already paid by the Debtor, the amount of \$1,110.00 will be paid through the Plan.

4. SECURED CLAIMS

- A. Mortgages and Other Direct Payments by Debtor. Payments will be made outside the Plan according to the original contract terms, with no modification of contract terms and with liens retained.

Name of Creditor	Collateral	Monthly Payment	Balance of Claim
Green Tree Servicing, LLC/Ditech	1234 N. Blvd., Bethlehem, PA 18017	\$940.00	\$253,147.60

- B. TOTAL BALANCE OF SECURED CLAIM including the Applicable interest, late fees and costs as follows:

Name of Creditor	Collateral	Amount to be Paid through Plan	Claim No.

- c. ARREARS on Secured Claims as follows:

Name of Creditor	Collateral	Amount to be Paid through Plan	Claim No.
Green Tree Servicing, LLC/Ditech	1234 N. Blvd. Bethlehem, PA 18017	\$50,000.00	

5. UNSECURED CLAIMS:

- A. After all secured and priority claims have been paid, all allowed unsecured claims shall receive a pro-rata share of the distribution.

6. EXECUTORY CONTRACT AND UNEXPIRED LEASES:

The following executory contracts of the Debtor are rejected:

None.

7. REVESTING OF PROPERTY:

Title to the Debtor's property shall revert in the Debtor on confirmation of Plan.

8. LIEN AVOIDANCE:

Debtor exercises her rights to avoid all liens as allowed by law under 11 U.S.C. Section 522(f).

Dated: 6/28/16

/s/ Carmen Betty Justiniano
Carmen Betty Justiniano

Acceptances may be mailed to:
Jose C. Campos, Esquire
The Law Offices of Jose C. Campos
251 East Broad St.
Bethlehem, PA 18018

PAYMENTS TO THE STANDING CHAPTER 13 TRUSTEE
SHOULD BE MADE PAYABLE AND MAILED AS FOLLOWS:

Frederick L. Reigle, Trustee
P.O. Box 680
Memphis, TN 38101-0680